

ROBINSON, McFADDEN & MOORE, P.C.

129642



CELEBRATING A CENTURY
OF SERVICE TO
CLIENTS AND COMMUNITY

DAVID W. ROBINSON, II
JOHN S. TAYLOR, JR.
DANIEL T. BRAILSFORD
FRANK R. ELLERBE, III
THOMAS W. BUNCH, II
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D. CLAY ROBINSON
R. WILLIAM METZGER, JR.**
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LYDIA A. ELOFF **
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CHARLES H. McDONALD
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** Certified Specialist in Bankruptcy
and Debtor-Creditor Law
† Also Admitted in North Carolina

Mr. Gary E. Walsh, Executive Director
South Carolina Public Service Commission
Synergy Business Park, Saluda Building
101 Executive Center Drive
Columbia, SC 29210

Re: BellSouth Telecommunications, Inc.
Section 271 Application
Docket No. 2001-209-C

Dear Mr. Walsh:

Enclosed for filing please find the The Southeastern Competitive Carriers Association's First Set of Interrogatories and Request to Produce to BellSouth. Please date-stamp the extra copies provided as proof of filing and return them with our courier. By copy of this letter we are serving the same on BellSouth and the other Intervenor of record.

If you have any questions, please have someone on your staff contact me.

DAVID W. ROBINSON
(1869-1935)
DAVID W. ROBINSON, JR.
(1899-1989)
J. MEANS McFADDEN
(1901-1990)
THOMAS T. MOORE
RETIRED
JAMES M. BRAILSFORD, III
RETIRED

Yours truly,

ROBINSON, McFADDEN & MOORE, P.C.

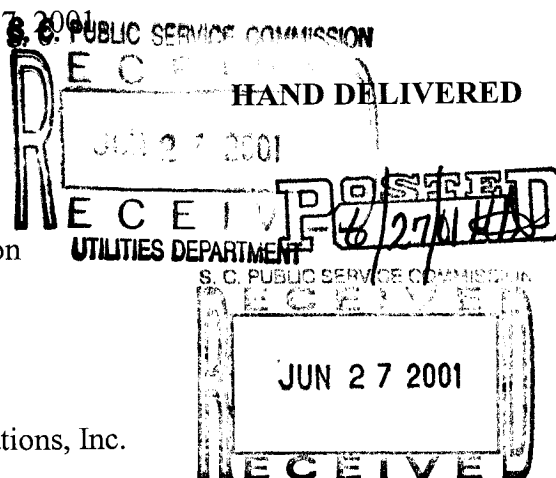
Frank R. Ellerbe, III

FRE/bs
Enclosure

cc/enc: All Parties of Record
Ms. Susan Berlin
Ms. Nancy Horne
Ms. Lori Reese



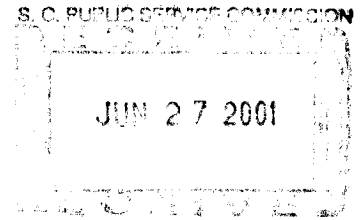
June 27, 2001



RECEIVED

SERVICE

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
Docket No. 2001-209-C**



In Re:

**Application of
BellSouth Telecommunications, Inc.
To Provide In-Region InterLATA
Services Pursuant to Section 271
of the Telecommunications Act of 1996**

**THE SOUTHEASTERN
COMPETITIVE CARRIERS
ASSOCIATION FIRST SET OF
INTERROGATORIES & REQUESTS
TO PRODUCE TO BELL SOUTH**

Pursuant to the South Carolina Rules of Civil Procedure, 26 S.C. Code Reg. 103-851, 103-854 and other applicable rules of practice and procedure of the South Carolina Public Service Commission ("Commission"), the Southeastern Competitive Carriers Association ("SECCA") hereby serves the following Interrogatories and Requests for Production upon BellSouth Telecommunications, Inc. ("BellSouth") and requests that BellSouth respond within ten (10) days of service:

INTERROGATORY / REQUEST 1-1

Provide each Form 477 filed by BellSouth with the FCC for South Carolina and for each other state in the BellSouth region.

INTERROGATORY / REQUEST 1-2

For the period reported in each Form 477 filed with the FCC, identify the number of unbundled loops by:

- A. Analog loops
- B. DS-1 unbundled loops
- C. DS-3 unbundled loops

INTERROGATORY / REQUEST 1-3

Provide, by quarter, the total number of minutes exchanged with CLECs from 1996 to the present.

INTERROGATORY / REQUEST 1-4

Provide, by quarter, the total number of local, intraLATA and interLATA minutes originated by BellSouth customers in South Carolina from 1996 to the present.

INTERROGATORY / REQUEST 1-5

Identify precisely how each of BellSouth's charges for optional daily usage files and access daily usage files are applied. Is BellSouth currently assessing these charges? If yes, when did BellSouth begin to apply these charges?

INTERROGATORY / REQUEST 1-6

Does BellSouth support any particular expedited dispute resolution procedure? If so, describe in detail that procedure.

INTERROGATORY / REQUEST 1-7

Provide by year, for each of the last five years, the number of minutes interchanged between BellSouth and CLEC networks. Separately identify:

- A. The number of minutes originating with CLEC customers and terminating with BellSouth.
- B. The number of minutes originating with BellSouth and terminating on CLEC networks.

INTERROGATORY / REQUEST 1-8

For each of the past five years, provide the number of minutes interchanged between BellSouth and CMRS networks. Separately identify:

- A. The number of minutes originating with CMRS customers and terminating with BellSouth.
- B. The number of minutes originating with BellSouth and terminating on CMRS networks.

INTERROGATORY / REQUEST 1-9

Provide for each of the last five years, the total number of BellSouth's:

- A. Local minutes
- B. Local calls
- C. IntraLATA toll minutes
- D. IntraLATA toll calls
- E. InterLATA access minutes
- F. InterLATA access calls

INTERROGATORY / REQUEST 1-10

Provide the annual revenue received by BellSouth for each of the past five years:

- A. For the lease of UNEs
- B. For the provision of resold services

INTERROGATORY / REQUEST 1-11

Provide the number of switched access lines in each of the deaveraged UNE zones.

INTERROGATORY / REQUEST 1-12

Provide all workpapers underlying the testimony of John Anthony Ruscilli, including a copy of all proprietary exhibits.

INTERROGATORY / REQUEST 1-13

Provide the number of interconnection trunks between BellSouth and CLECs separately identified between:

- A. One way trunks delivering CLEC originated traffic to BellSouth;
- B. One way trunks delivering BellSouth originated traffic to CLECs;
- C. Two way trunks between BellSouth and CLECs; and
- D. Any other type of interconnection trunk, with a brief description explaining its function.

INTERROGATORY / REQUEST 1-14

To the extent that Mr. Milner and Mr. Ruscilli's reported number of resold lines, UNE Loops and UNE Loop/Port Combinations differ, please provide:

- A. A listing of each type of arrangement counted by Mr. Milner and/or Ruscilli that is not considered by the other;
- B. The exact number of lines in each category identified in (a) above;
- C. An explanation as to why one witness includes the category in (a) above and the other does not;
- D. Identify whether the category is included/not-included in BellSouth's Form 477 Reports to the FCC; and
- F. For any category not included by BellSouth in its Form 477 reports to the FCC, explain why the category was not included.

ROBINSON, McFADDEN & MOORE, P.C.

By _____

Frank R. Ellerbe, III
Bonnie D. Shealy
Post Office Box 944
Columbia, SC 29202
(803) 779-8900

Attorneys for Southeastern Competitive Carriers
Association

Columbia, South Carolina

June 27, 2001.

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

Docket No. 2001-209-C

In Re:)
)
Application of)
BellSouth Telecommunications, Inc.)
To Provide In-Region InterLATA)
Services Pursuant to Section 271)
of the Telecommunications Act of 1996)
_____)

CERTIFICATE OF SERVICE

This is to certify that I, Carrie Adkins, with the law firm of Robinson, McFadden & Moore, P.C., have this day caused to be served upon the person(s) named below the **First Set of Interrogatories and Request to Produce to BellSouth** on behalf of the Southeastern Competitive Carriers Association in the foregoing matter by hand delivery.

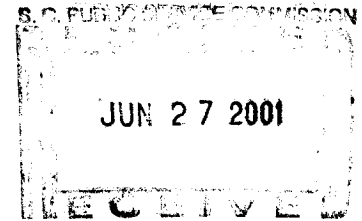
Caroline N. Watson, Esquire
BellSouth Telecommunications
1600 Hampton Street, Suite 821
Columbia, SC 29201

Dated at Columbia, South Carolina this 27th day of June 2001.


Carrie Adkins

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

Docket No. 2001-209-C



In Re:)
)
Application of)
BellSouth Telecommunications, Inc.)
To Provide In-Region InterLATA)
Services Pursuant to Section 271)
of the Telecommunications Act of 1996)
_____)

CERTIFICATE OF SERVICE

This is to certify that I, Barbara Standridge, a legal assistant with the law firm of Robinson, McFadden & Moore, P.C., have this day caused to be served upon the person(s) named below the **First Set of Interrogatories and Request to Produce to BellSouth** on behalf of the Southeastern Competitive Carriers Association in the foregoing matter by placing a copy of same in the United States Mail, postage prepaid, in an envelope addressed as follows:

Francis P. Mood, Esquire
Haynesworth, Sinkler & Boyd, P.A.
Post Office Box 11889
Columbia, South Carolina 29211
(AT&T)

Darra W. Cothran, Esquire
Woodward, Cothran & Herndon
Post Office Box 12399
Columbia, South Carolina 29211
(MCI Telecommunications Corporation)

William Austin, Esquire
Austin, Lewis & Rogers
Post Office Box 11718
Columbia, South Carolina 29211
(BellSouth)

Scott Elliott, Esquire
Elliott & Elliott
721 Olive Street
Columbia, South Carolina 29205
(United Telephone & Sprint Comm.)

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(Knology of Charleston & SC)

John J. Pringle
Post Office Box 11547
Columbia, SC 29211
(Access Intergrated Networks, Inc.)

Kennard B. Woods, Esquire
MCI WorldCom, Inc.
6 Concourse Parkway, Suite 3200
Atlanta, GA 30328

Dated at Columbia, South Carolina this 27th day of June 2001.


Barbara Standridge